

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SUE MI TERRY,

Defendant.

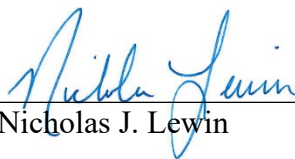
24 Cr. 427 (LGS)

NOTICE OF MOTIONS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Dr. Sue Mi Terry's Pretrial Motions, the Declaration of Nicholas J. Lewin, the Declaration of Dr. Sue Mi Terry, and the prior pleadings and proceedings heretofore had herein, Defendant Dr. Sue Mi Terry respectfully moves this Court before the Honorable Lorna G. Schofield, United States District Judge for the Southern District of New York, 40 Foley Square, New York, New York 10007, at such date and time as the Court may direct, for an Order dismissing the Indictment or, in the alternative, granting Dr. Terry's pretrial motions: (i) directing the government to produce a bill of particulars, (ii) suppressing Dr. Terry's coerced statements, and (iii) suppressing information and materials that were unlawfully obtained pursuant to the Foreign Intelligence Surveillance Act of 1978 ("FISA"), as amended, 50 U.S.C. §§ 1801–1812 and 1821–1829, and granting such other and further relief as the Court deems appropriate.

Dated: New York, New York
February 26, 2025

Respectfully submitted,

By: 
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